Jeffrey A. Rothman

Attorney at Law 315 Broadway, Suite 200 New York, NY 10007 Tel.: (212) 227-2980; Cell: (516) 455-6873

Fax: (212) 591-6343 rothman.jeffrey@gmail.com

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:_____
DATE FILED:_____

November 14, 2019

By ECF To:

Honorable Katharine H. Parker United States Magistrate Judge United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

MEMO ENDORSED

Re: Giselle Melendez v. City of New York, et al., 18 Civ. 5390 (AJN)

Your Honor:

I am counsel for Plaintiff in the above-captioned action. I write, with opposing counsel's consent, to respectfully request (1) that the status conference presently scheduled for this Monday, November 18, 2019 at 3:00 p.m. be either adjourned to a later date, or cancelled, and (2) that all discovery dates presently applicable as per Your Honor's Order dated July 10, 2019 (docket # 61) be extended by two months (such that the fact discovery end date is moved from December 30, 2019 to February 28, 2020). There has been one prior extension to the discovery schedule (docket # 61).

The parties are presently cooperating in the exchange of discovery, and do not presently have any issues to raise with the Court. Should any impasse arise, the parties propose that we at that time write the Court to request either an in-person or a telephonic conference to address any issues at that time.¹

I also make the instant application because - in addition to a number of other deadlines in other cases and personal matters I have been and am dealing with - I am in the process of moving my office to another building, which has been and will continue to be for the coming few weeks a significant disruption to all of my activities.

¹ Should the Court wish to adjourn the conference to another date, opposing counsel notes that she has a trial scheduled for the week of December 9, 2019. I likewise note in that regard that I am presently unavailable from December 19, 2019 through New Year's Day.

I thank the Court for its consideration in this matter.

Respectfully submitted,

/S/

Jeffrey A. Rothman

<u>APPLICATION GRANTED:</u> Fact Discovery is hereby extended to <u>February 28, 2020.</u> The Status Conference in this matter that is scheduled for Monday, November 18, 2019 at 3:00 p.m. in Courtroom 17D, 500 Pearl Street, New York, NY 10007 is hereby rescheduled to <u>Tuesday</u>, <u>January 21, 2020 at 10:15 a.m.</u>

APPLICATION GRANTED

Kathaun H

Hon. Katharine H. Parker, U.S.M.J.

11/14/2019